

William T. Walsh  
PROSKAUER ROSE LLP  
11 Times Square  
New York, NY 10036  
(212) 969-3908  
wwalsh@proskauer.com

*Attorney for RWJ Barnabas Health, Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**CAREPOINT HEALTH SYSTEMS  
INC., et al.**

Plaintiffs,

V.

RWJ BARNABAS HEALTH, INC.,

Defendant.

22-cv-05421-EP-CLW

Hon. Evelyn Padin, USDJ

Hon. Cathy L. Waldor, USMJ

## Oral Argument Requested

## NOTICE OF MOTION

**PLEASE TAKE NOTICE THAT** Defendant RWJ Barnabas Health, Inc. (“Barnabas”) hereby moves this Court for an Order granting Barnabas’s Cross-Motion for Summary Judgment pursuant to the Federal Rule of Civil Procedure 56.

**PLEASE TAKE FURTHER NOTICE** that in support of its motion, Barnabas shall rely on the accompanying Brief, the Statement of Undisputed

Material Facts, Declaration of William T. Walsh, and the exhibits appended thereto.

**PLEASE TAKE FURTHER NOTICE** that Barnabas encloses herewith a proposed form of Order.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Rule 78.1, Barnabas respectfully requests oral argument on the Motion.

Dated: June 30, 2025

Respectfully submitted,

/s/ William T. Walsh

William T. Walsh  
David A. Munkittrick\*  
PROSKAUER ROSE LLP  
Eleven Times Square  
New York, NY 10036  
(212) 969-3000  
wwalsh@proskauer.com  
dmunkittrick@proskauer.com

Colin R. Kass\*  
Erica T. Jones\*  
PROSKAUER ROSE LLP  
1001 Pennsylvania Ave, N.W.  
Washington, D.C. 20004  
(202) 416-6800  
ckass@proskauer.com  
ejones@proskauer.com

*Attorneys for Defendant  
RWJ Barnabas Health, Inc.*

*\* Admitted Pro Hac Vice*